

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

OCLC, INC.,	)	CASE NO.: 2:25-CV-309
	)	
PLAINTIFF,	)	JUDGE: EDMUND A. SARGUS
	)	
V.	)	MAGISTRATE: ELIZABETH PRESTON DEAVERS
	)	
BAKER & TAYLOR, LLC, ET AL.,	)	
	)	
DEFENDANTS.	)	

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**MOTION FOR ADMISSION PRO HAC VICE OF FRANK E. NOYES, II, ESQ.**

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Pursuant to S.D. Ohio Civ. R. 83.3(e), Derek P. Hartman, one of the Attorneys for Defendants Baker & Taylor, LLC and Bridgeall Libraries Limited in the above-referenced actions, hereby moves this Court to admit Frank E. Noyes, II, of the law firm Offit Kurman, *pro hac vice* to appear and participate as co-counsel in this case for Baker & Taylor, LLC and Bridgeall Libraries Limited. A proposed order reflecting Mr. Noyes's admission *pro hac vice* has been submitted in connection with this motion for the Court's convenience.

Derek P. Hartman represents that Mr. Noyes is a member in good standing of the highest courts of Pennsylvania and Delaware, as attested by the accompanying original certificates of good standing from those courts, dated April 21, 2025 and April 11, 2025

respectively, which are attached hereto as Exhibit "A." Mr. Noyes is not eligible to become a member of the permanent bar of this Court. Mr. Noyes is paying the required filing fee via credit card and will register for electronic filing with this Court upon the granting of this Motion. Mr. Noyes's identifying information is as follows:

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Respectfully submitted,

/s/ Derek P. Hartman

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*Attorneys for Defendants Baker & Taylor, LLC and  
Bridgeall Libraries Limited*

**CERTIFICATE OF SERVICE**

A copy of the foregoing was filed electronically on May 6, 2025, with the Clerk of Court using the CM/ECF system. Service will be made through the Court's CM/ECF system on all parties and attorneys so registered, and all parties may access this filing through the Court's system.

/s/ Derek P. Hartman

Derek P. Hartman (0087869)

*One of the Attorneys for Defendants Baker & Taylor,  
LLC and Bridgeall Libraries Limited*